

1:20 1/22/88 L²

JT talked to
Roy Schrameck
SFC. water

US EPA RECORDS CENTER REGION 5



404001

~~REDACTED~~

now JT thinks they can agree
to the change proposed by BASF to WD

I'll send response to BASF

12/4/87 letter & cc L²

- say will defer decision until
results of WD study
& their recommendation

Bob Newport - WD 8:15 1/20/88

they are going to
send orders to do a study

cc'd me + Connie + LH

steel -
ditches

quantity amount
of seepage
chemical quality
test during rain
events

~~use~~ to determine if
have a runoff problem

will circulate copies of study

6/6/86
2/4/88
1/25
message
LH

answering
cc yet
so far
order is in
runoff
right now
2:05 pm

↑
cc of 2/23
orders &
study

Leonard Lepinski, MDNR 517/373-2790

11/20/88

cc BASF

8:00 AM ^{sick} message left to call me Fri

Bob Newport 6-6766 - Water Division

^{8:00 AM} message left ^{re} BASF,
that I will talk to
Mich. on Fri.

Bob Newport
WD

3:25 1/6/88

after SF letter goes out / WD will send
out a letter
if^{SF} decline on fl. drain

will do study } characterize seepage - both
ditch
characterize stormwater

either require NPDES or no
depending on study

call BN after talk to 2nd

Richard Miller
413-549-7589

4 BASF - CD
11:00 11/6/88
Bonnie Eleder, RPM

- I returned his call to Bill Menez.
- w/ OIL Chem & Atomic Chem Union
represent workers at BASF
- ? he has: read an article 6 months ago

CD for BASF allegedly violated
DOJ brought action against BASF
in Detroit & CD

Spoke to DOJ in DC
they rec. contact Reg II

^{he also} send FOIA 6 mo ago + again
to Tom ^(to DOJ) - ? but no response

they
have been
tracking
case
since 1980

he's looking for site update:

I told him - 3 wells were removed + we required they be replaced - BASF replaced them mid Sept & now in compliance as regards well

* CD required
remediation action
involving app'd
instead of news, etc.

he wanted to know
why BASF's was
replaced
seems ridiculous
cons'cutive
not 3 wells

Why take action for just 3 wells -
I said I couldn't answer - not
my decision

offsite migration ^{of wastes} to mu? " doesn't appear so "

30 yrs monitoring period?

believe so - would check CP

any other actions?

not that I'm aware of
no amended COI? ^{as regards this action}

not that I'm aware of - but
talk to CP

he'll call CP

He said he mailed a FOIA to EPA
(Mueller) several days ago

2:30 12/16/87

L² - re BASF

{ (X) didn't sample for PCBs in new wells

I'll review sept. results

J. Tucka is out of office -

he'll be in office Thurs - so he'll (f?)
talk to him then

J² will call me

for Schrammick
(he talked to someone in SFC waters
this person doesn't understand
why not go w/ change)

1:05
12/17/87

L² J+T's trial extended

2 more days

we'll talk after
New Year

he'll call
on 1-5-88

2:20 PM 12/11/87 + L²

talked to Jim Trucka - he said they

will not accept change in CD that ^{take an} maintains status quo (does n't improvement) of site

for ex. - put in french drain +
seepage

Connie: 2:30

will go along w/ whatever
we say (me + MDNR)

Bob: 2:35

expressed our (SF+MDNR)
concerns on change
in CD

Bob believes is a net reduction

~~██████████~~
in contaminants entering the river

I countered saying that cont. in leachate comes
from GW (the ^l is GW that contains + leaking
from weak part of site - into ditch) + whether

- Bob not in on Mon - so I'll call Tues.

{ - I suggested setting up a phone
meeting



These cont. enter river via GW or via
surf. drainage - it's the same in
the end - they are still entering the
rivers

source is same - is the waste -
which is picked up by GW -
which either flows to river,
or leaks out the sides of fill
+ washes to river

2:45 - Connie

- I gave her runthrough
on concerns w/ Bob
- willing to meet to discuss
- I'll call CP on Mon.

Leonard Lipsinski

10:30 AM

re 12/4 letter

12/11/87

message left

• rec'd 12/4/87 letter

• conceptually - OR

• will send letter - *go ahead w/ design

• coordinating w/ WD (Bob Newport)

- MDNR are agreeable w/ concept

- wants to touch base w/ his supervisor

- shouldn't be a problem

- go ahead w/ letter -

11/13 letter - ab PCB anal at Well Cr. Jim Traska

already requested

5/19/87 -

+ we approved

July 14

517-373-

2794

at mtg. last week -

I asked if locations of
wells are mapped - SASF
said yes & will send us copies

12/11 early
Am

Bob Newport

b-6766

Water Div.

re BASF

Adm Order

met last wk / trip report / cc'd me

BASF proposed a change to the site

take out concrete ditch & use sump lines

L² was at mtg.

combined response

our letter - make this response

Tall
Bob

one univ
letter

that it is in response

to both 12/4 letter

and Water's meeting

cc letter to Bob

+ ~~Bob~~ Schenker

* ~~Bob~~ Shankar (Bess) Elizabeth

Phone conversation with Leonard Lipinski; MANK
re BASF 10/19/87 9:25 AM Bonnie L. Eleder, RAM

Ld returned my call. I asked for a report on the well installation at BASF. Ld said that the 3 wells were put in. He said a letter would be coming out this week describing the work.

1. Well #8: was placed ~75' S. of original #8 - they got saturation.
2. 3 attempts for background well - chose one with greatest thickness of permeable material - located at south end of site.
3. #4: chose a spot based on plans (he could not stay to view all of installation).

Ld mentioned that this well was ^{the} 2nd well put in at location #4 because CD called for 2nd wells under certain conditions. Ld said BASF installed both #4's at the same time, & later found ~3' water in 1st well. (CD calls for 2nd well when 6' of water in 1st well). Ld said that he questions the need for the 2nd well - but they put it in anyway.

Ld said Bill Axler, BASF, called him later in September & told him #8 + background had water, but #4 didn't. Ld said that BT then said they later were able to sample all 3 wells.

Ld also said that the MIA.G. may decide to go for penalties from BASF, too.

Connie Ruchalski
2/11/87 3:00 PM

① Boe - ROD
- mtg
letter)

- ② BASF - send ^{cc of} letter to Connie
- she had phone Conn. all this AM
- she'll tell them to go forward
- penalty: 30,666 initially
today: DOJ + ORC came
up w/ \$40,000 because
had to file
- probably the bottom
line figure
- may settle -
BASF did offer - but
20,000 - Gov't
20,000 - Env. charitable
organization
- guidance says cannot
do this
- are transmitting
this to BASF on Mon.

- Michelle Roddy also on line
+ will recommend it to her
client.
- discovery - until 9/30 to answer/CP will
call me 9/15 AM to do

1:30 9/2 dd, cont.
phone
Pconver

we agreed that dd would arrange w/
BA as to time for installing
3 wells on 9/16
upgradient well - will do boings
to find best location
wells 8+4 - based on dd's best
guess in location

Bil Ace 9/2/87 1:40 PM

arrange time w/ dd
boings to determine upgradeant = ^{find a permeable layer}
#8 + #4 - where dd recommends

he doesn't remember #4
but has no problem w/ it

9:45 AM

9/2/87

Bill Axee

{ Sou log - he checked w/ Keith Fry -
Keith Fry in error - there are none

{ 6 or 9 - Dale Rausch , he talked to -
ck'd files - can see no confusion -
so I will ck my file

{ driller can put in wells on 16th

{ I'll ck w/ Ld & call him back

Leonard Lipinski 9:50 AM 9/2/87
- no answer

1:30 9/2

new # 373-2790 (517)

- he can be there on 16th -

- BA is agreeable to test borings for
(in 8+) background only

metry

will punch until we're satisfied

Phone conversation with ~~Bill Axee~~, BASF
313-246-6161 re BASF Site
1:20 PM 8/28/87 Bonnie Eleder, RPM

I told B.A. that I had not received the promised
boiling logs/field notes (Keith Fry at A-3-82
meeting said they'd be sent so that we
could make a determination on
wells locations) - But I did talk to Leonard
Sipinski^{now}, who checked their files &
came up with a suggested location for well #8,
but not for the upgradeint well nos #4,
due to a lack of information. I asked about
postponing the wells' installation until he
sent us the boiling logs/field notes. We
agreed to: ① set a new ^{tentative} date of Sept. 16, & ②
I call him on 9/2/87, Wed., in the afternoon &
he'll let me know about the logs & we'll
finalize the date.

2:25 8/28/87 Leonard Sipinski, MDNR
517-~~851-2398~~
NOW # 373-2790 message left to call
~~I relayed above info.~~

Bill

Axce - BASF 1:50

8/24

refine w/ them to place
wells in diff. locations

Sept. 1 drilling

313

246-6161

I call tomorrow

517-225-2348 - 2:10

12:10 AM - message left
for Bill to call
from Bill to call
1 PM 8/24 2013

BF - message left

1 AM
message left
for Bill to call
no 8/26
2:50 pm

12/3/86 meeting

Keith Fry started his well log
(in field notes)

(4+8 drilled of A (OE present))

✓

was to send to me

pg 8 of notes talk of replacing 87, + 4

(and 4 would need to wait for
water to recede)

?'s not answered.

sample results:

95 + 9D - get tables show one 9

CA

to
answer a letter
refers to 65 + 6 D - are these confused?

? of "pipe lifting" in rep. report (wells E+F)

"and settled around pipe"

"protective
casing / well of"

DL 8:50 AM 8/24/87

message left

9:00

ff agrees w/ idea of
doing soil dumping
first / a reasonable
idea

Also talked
about postponing
well drilling
until after
fall rain

8:10
8/25

call at 1 or 1:30 to DL + RA to discuss
MW placement

~~Kevin - ask if RA is being reviewed
by Dave Dolan~~

Phone conversation with Leonard Spiniski, MDNR

517-335-3398 at BASF

8/20/87 8:50AM

Bonnie Eelder, RPM

LL called me - said he had looked over the soil
boeing logs for the site & in terms of the
location^s for well #8 and the upgradient
well:

1. Well #8: one soil boeing, 6' deep, showed
4' of fill, then 2' of clay
another soil boeing showed 6' of
fill (was 6' deep)

he would recommend placing this well
~100' E of the old #8 (toward
river) which is in the center of the fill

2. upgradient well: he is unsure where to place this
well because the few boeings there are in
this area of the site show only clay
- I told him I'd talk to Connii Puchalski, ORK, & get
back to him.

Leonard Sipinski, MDNR
re BASF 8/19/87
Bonnie Eleder, RPN

517-335-3398

I called to tell LH that BASF is sending us a letter regarding installation of the monitor wells & we need to respond to it. Has he looked at files from Detroit (booring logs + soil borings) & come up with any recommendations?
(wells 8 and 7)
~~7/19/87~~

message left 1:55 8/20
2:05 8/19/87

he looked at files & can't get much from them
so 50-100' south of original location

geology ↑ isn't consistent
for #8

for #7 - no idea of where
to put it

he'll pull borings back out &
review them

↳ rec'd certified letter re wells → BASF will
mail on 8/14/87 do on 9-1-87

LH thinks he'll be able to go out on site
he'll call me in AM

9:50 AM
8/19/87

(filled on
July 21)

BASF
heard from DOJ
contempt motion filed
responded to it

now willing to pay
~30,000 (earlier figure)

but not acceptable to SPA \rightarrow 50,000 +
plus reinstallation of valves cost of filing (10,000)

~~BASF~~
~~and enc~~
~~letter~~
~~want well~~
~~* I will~~
~~call L~~

Phone conversation with Joan Arthur, Water Division
9:00 AM 6/25/87 re BASF/Wyandotte, MI site
Bonnie L. Eleder, RPM

JA called for 2 reasons:

- (1) to request that I continue sending her a copy of the GW data BASF submits yearly - (next one will be June '87)
- (2) to inform me that WD has an Administrative Order in sign-off, citing BASF for groundwater contamination & surface water contamination - ~~EPA~~ asks BASF to develop a plan to evaluate the site, to determine what is being discharged, & come up with a remediation plan. Also, if contaminants are being discharged above a level of concern, an NPDES permit is required. She said the AO will go out within next couple of weeks.

When questioned, JA answered that there is no attorney assigned, but that the AO would go to OEC for review. I told her that Connie Puchalski was involved with the site, (through superfund) & that she would be interested in seeing the AO. JA also said she would send me a copy of the AO.

✓ Bonnie Eleder, LPM
- BASF Wyandotte,
MI

Leonard Lipinski
MDNR

517-335-3398

re

{ ? boring logs from wells
? soil borings done by state, etc.

9:55AM 5/13/87 - message left to return
my call

1:20 PM - SL returned my call

he did get files out of Detroit office
he will look at + make decision on a
location
~~buying~~

Someone interested in ^{buying} Firestone property

Detroit R-quality

certain

sea. hot spot - next to BASF site

↑
a recent study by Mich State Univ.

funded by EPA

Keith Fry has
• boring logs from well installation

soil borings by Dames & Moore
well logs
add'l borings by another firm
MI has boring logs (did borings)

AS

BASF send MW boring logs + MI sends
other info to me

resolve ID of wells question

2 sets results indicate 9S + 9D / yet only 1
well at 9 & table mentions only a 9

letter says 6S + D - are 6 + 9 confused

CAXC took on this

3S 4D
,

? of what "pipe lifting" means in misp. report - E+F
"grnd settled around pipe" - E+F

Phone conversation with Tom Nowicki, ERB, 6-4244
U Jefferson-Conner, Detroit, MI
8/5/87 2:30 PM Bonnie D. Eleder, AM

I related to TN that I had reviewed the information he gave me yesterday on the above named site dated 7-27-87. I told him my major concerns or comments revolved around the following:

- ① the liability issue - Detroit should look closely into what this involves - particularly in terms of RCRA and potential CERCLA/SARA
- ② the guidance request - the EDG can arrange to come in and review any guidance we have, plus anything in the EPA library, plus any Superfund site documents available to the public. I told him that I wasn't aware of a publication giving generic clean-up criteria for Superfund sites, other than Federal + State regulations. But I also said that clean-up levels are determined on a site by site basis, on the regulations and the risk assessment.
- ③ the oversight request - I doubted EPA (at least Superfund) could provide this - but said that the state should fulfill this role - particularly if the site is subject to RCRA
- ④ the flow chart needs some work on it - the process is not clear as to why certain steps are taken in the order shown.

TN said he'd put a letter together & send it to me to review.

8/3/87
ATM

Tony N
Bill

Mike

MDNR

(HE)

1. QAPP
2. How Clean is Clean
3. HSEP → OSHA
4. mini. plans - one to each property as receive title (52 parcels)

Chrysler wants to
start construction
June '88

Chrysler have title by Jan '88

City retains all liability - only way
(or else Chrysler moves)
out-of-state

Chrysler will
agree

5. SW contain - if found - must it
be cleaned up. If people are on
city water - talk to DNR
re state law



City (ERG):



Chrysler
Mac Plant /
PLB's paid to City for \$1
~~trans + GRIC~~
~~oil + PLB's~~

1-26-84
~10 AM

phone conversation with Tom Nowicki,
ERB, 6-4244

RE Final EIS - Jefferson Cy.

Bonnie L. Eleder, RPM, CES

I called TN to tell him I had received a copy of their draft letter to the City of Detroit & had reviewed it & also re-reviewed the final EIS. I said my only comment - recommendation is that on pg. H-15 under "Safety + QA/QC" - the EPA + MDNR should be involved in the development of plans outlining safety + QA/QC. I said I would send a memo once it is typed. TN said he would send me a final copy of the letter to review prior to mailing.

Connie

1/16/87

9:15AM

to BASF

rec'd letter - ^{rec'd} yesterday

unwilling to pay any penalties

she talked to
John Schaefer who denies
saying BASF could pull wells

DOS irate - want to go for
\$1000/day penalty

might want to decide on

where we want wells to be put

Phone conversation memo:

Leonard Lepinski, MDNR, 517-335-3398

re BASF

1/16/87 3:30 P

Bonnie F. Eledes, RPM, CES

I called LL to ask him to send to sample results for the leachate. He said he'd mail them in the AM.

Also, LL said that he's "looked" for the BASF boring logs & asked another MDNR geologist to bring the file from Detroit when she attends a meeting at his office Thursday. LL said once he reviewed them, he'd call me.

rec'd 1/16/87

Sent to Joan Arthur, WID 1/16/87

Phone conversation with Joan Arthur, Center Division,

6-6703 re BASF Wyandotte Site, MI 8:45A 11/24/86

5 WQC-TUB-8

Bonnie L. Eider, RPM

JA called me to find out whether we had any recent (1986) data for groundwaters and leachate (in the drainage swale). I said yes & I would send it - groundwater. As to the leachate in the drainage swale, I told her that the MDNR had sampled 1-2 months ago & I was expecting the results this week. I said I'd send this data as soon as I received it. JA told me that they consider the discharge from the drainage swales & the groundwaters to be point source discharges & would require a permit. But, they ~~1st~~ need more data, & it must show ~~contaminants.~~ sufficient levels of that a permit is needed. I said I'd call with the leachate results.

Frank Belobravidich
called re BASF/FMT

2:30 pm
10/2185

We rec'd call from Mr. Axle

who notified ^{that} work on joints ^{will be done} tomorrow

Frank will be there in AM to observe

also Mr A will zerox sampling results + send copy

F will write up a memo of his visit + will send me a copy

TO : BASF/FMT file
FROM: Bonnie Eelder, RPM, CES
DATE: 2/21/86
SUBJECT: phone conversation with Bill Axce re
letter dated 2/13/86 from EPA

2/13/86

Mr. Axce called in reference to the letter I had sent him concerning several deficiencies relative to the Consent Decree for the BASF/FMT site. He answered to each point/question raised in that letter and also said that a written response would be mailed next week. He also said that there was a time lag between our two cities - he received the letter on 2/18/86. The points he addressed are as follows.

- ① lack of inspection report - Mr. Axce said that the inspection had been done in December but that the report never got out. He apologized for it. He said that the inspector ^{had} needed to ~~review it~~ with the engineer, but couldn't until after Christmas, then he was gone and the report never got any further. The report will be mailed next week.
- ② data on clay cap - ^{he} will mail next week.
- ③ well boring logs - Mr. Axce said he'd have to get them together - then he would mail them.
- ④ 2 plugged wells - Mr. Axce said that these 2 wells were dry when they were drilled, so they were plugged. He said new locations were picked for 2 new wells. He said he'd mail ~~#~~ a diagram or map showing the 2 wells plus their analyses (for I said that I had no information

pertaining to them) with the weeks coming
long.

He ended with saying that should he run into
any problems he would call me. I thanked
him for his call.

cc: Pam Rector, ODC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

31 MAR 1986

REPLY TO THE ATTENTION OF:
5HE-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C.W. Axce
General Manager - Wyandotte
BASF Corporation, Chemicals Division
1609 Biddle Avenue
Wyandotte, Michigan 48192

Dear Mr. Axce:

Thank you for your response dated March 5, 1986. What follows are questions that have arisen after reading your letter, reviewing the site plot plan and referring back to the requirements outlined in the Consent Order.

According to your letter, on June 19, 1985, Wells 7 and 10 were plugged and pulled because they were dry. Well 10 was originally installed to replace well 7. On what date was well 10 installed? Why was only MDNR approval for well 10 sought (i.e. EPA was not contacted)? Was there any correspondence following up on this change in the location of the upgradient well? Why has there not been an upgradient well drilled to replace well 10?

In your letter it states that well 4E was also plugged and pulled on June 19, 1985. Which well does this designation refer to? Is this the well originally installed February 5, 1985 as required in the Consent Decree, or a different well?

The numbering system for the monitor wells has become somewhat confusing. The Consent Decree requires nine wells at nine locations, numbers 1-5 as perimeter wells, number 7 as the upgradient well, and wells 6, 8 and 9 to be installed through the clay cap. Your letter refers to the situation regarding the wells as follows: There currently are 10 wells at 7 locations numbered 1, 2 deep, 2 shallow, 3 deep, 3 shallow, 4, 5, 6 deep, 6 shallow and 9. First of all, wasn't well 4 (4E?) plugged and pulled on June 19, 1985? Are wells 4 and 4E the same well, or two different wells? Secondly, the site plot plan lists thirteen wells numbered 1 through 13 consecutively without reference to which is deep or shallow. But the site drawings depict the wells such that wells 11, 12 and 13 are next to (respectively) wells 4, 3 and 2. Are wells 11, 12 and 13, then, the shallow wells? Which wells are plugged? Which wells fulfill the requirements of the Consent Decree?

What are/were the well elevations and coordinates for a) the original nine wells required by the Consent Decree, b) well 10, c) well 4E, and d) the additional shallow wells installed, 2 shallow, 3 shallow and 6 shallow?

Your prompt responses to these questions will be appreciated. Should you have any questions, please do not hesitate to call me at (312) 886-4885.

Sincerely,

Bonnie L. Eleder

Bonnie L. Eleder
Remedial Project Manager

9/30/85
9:30am

Mr. C. W. Axee - Coordinator - BASF/AMT side
BASF Corp. - Called

he'll send copy of sample results directly to me
they will repair drainage ditch later this week
he'll call me once completed

Frank Belobaidich
MDNR - I called
313-459-0770
re BASF
req'd sample results? No

9/30/85 9:15 am
9/24/85 good
no paper left by Shelly S.
to call

{ has Mr. Acee notified you that joints were resealed? No - nothing heard
been out to check on? No - waiting on call
from Mr. Acee

satisfied w/ sealing joints to correct leachate problem?

No, not satisfied w/ it

altho did do what agreed to in CD

should take further corrective measures
but attorneys may see they are bound to to more

under
Act 307 in Mich:

funds still obligated for site - he recommended keeping
funding because still have problem
may have to use funds to correct problem

Should approach BASF - remedy doesn't work - are you
willing to do more?

MDNR has sampled leachate - found metals - but below
EP toxicity level
Sept '84

(2)

2 wells sampled April - but no results yet

know what waste streams went into lf? will check
FB called 10/1/85 - no
mention of specific
streams

I'll remind Mr Axe to send sample results
directly to him

F. B.
MDNR
Groundwater Quality Div.
15500 Sheldon Rd.
Northville, MI 48167

7/29/80 AM - Connie Pickaloski

- BASF - Roger suggests letter
come from us - by next week
- give them 30 days to correct
- then referral if no response
- has call in to David Hird
- has talked to Helen Keplinger -
no much talk on it
- draft portion w/ technical
stuff

12:00 pm 1/17/84

X

RANDY P. DURKIN
CITY OF RIVERDALE

BASF

THE CITY WAS UNABLE TO REACH AN AGREEMENT AS TO
LONGTERM LIABILITY WITH BASF.

BASF & THE CITY REACHED AN AGREEMENT RE:
SOME MINOR MODIFICATIONS AT THE BASF SITE-SLIP (NOT
A PART OF THE REMAINING CLEANUP). THE CITY SENT A
LETTER TO DJJ & US (COPYING DANGER) EXPLAINING
THE AGREEMENT. THE CITY'S BASF MAY TRY TO REACH
OTHER AGREEMENTS AFTER THE CONSENT DECREE IS
ENDED & THE DECREE WHICH IS MODIFIED UNDER
THE NEW USE PROVISIONS

① GET THE CO ENTHUSED. U.S. ATTYS OFFICE WILL DO SO
RIGHT OR FORWARDED. ② GET PMT DISMISSED

1/17/84

D Valente

GAR/UHLRICH/SCHAFFER

(1)

DICKINS/NANDINI ATW/
BARTELT